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September 3, 2020

Hon. Brian M. Cogan
U.S. District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States of America v. Gregory Altieri
Indictment No.: 20-CR-0249 (BMC)

Dear Judge Cogan:

I am retained counsel to Defendant Gregory Alteri. I write to respectfully ask Your Honor to modify Mr. Altieri's conditions of pre-trial release by removing one of the three suretors, Mr. Rick Hein, who signed Mr. Alteiri's \$750,000 PRB on July 14, 2020 when he was arraigned on the instant indictment (No. 20-CR-0249 (BMC)).

On July 14, 2020, Mr. Altieri self-surrendered to agents of the FBI after which he was presented before Magistrate Judge James Orenstein. The government consented to Mr. Altieri's release on the above-mentioned bond.

In anticipation of Mr. Altieri's arrest, I prepared to present a bail package to the government for its consideration of whether or not it would consent to Mr. Alteiri's pre-trial release. In the weeks before the arraignment, I extensively interviewed Mr. Hein, thoroughly explained all things attendant to a person acting as a suretor, and answered all of his questions. On the morning of the arraignment, I reiterated my explanation. Mr. Hein had no questions. The

government also interviewed Mr. Hein and explained many of the same details and issues to him. Mr. Hein was willing to act as a suretor. Mag. Judge Orenstein then engaged in the usual colloquy with Mr. Hein during the arraignment, and Mr. Hein gave the Court permission to sign the bond for him. Mr. Hein has since decided that he would feel more comfortable withdrawing as a suretor¹.

The government and I also have extensively interviewed the other two suretors, Salvatore Dalguano and Harry Kaminsky. Since then, I have interviewed them again to ensure their continued willingness to act as suretors. Given their respective strong financial responsibility, I am confident that they are satisfactory even without Mr. Hein's inclusion as a suretor.

Since Mr. Altieri's release on July 14, 2020, he has complied with every condition of release set forth by Mag. Judge Orenstein. During most weeks, Mr. Altieri and I maintain daily contact as we navigate his criminal case and bankruptcy case. He's a lifetime New York resident with no foreign ties, and has been married for almost 28 years, and with his wife continues to raise his two children, ages 19 and 21.

Accordingly, I respectfully ask Your Honor to allow Mr. Altieri to remain at liberty with the above proposed bond modification.

¹ Mr. Hein has become a creditor in a parallel Chapter 7 bankruptcy case that had been initiated against Mr. Altieri months before his self-surrender. It is my understanding that Mr. Hein's bankruptcy lawyer has communicated with the government his client's intention to withdraw from the bond.

The government consents to this request.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

cc: A.U.S.A. Lindsay K. Gerdes
A.U.S.A. Andrey Spektor